

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

JESSICA FRYREAR

PLAINTIFF

v.

CIVIL ACTION NO.: 4:22-CV-112-MPM-DAS

**WASHINGTON COUNTY, MISSISSIPPI
JARRELL EVANS AND CEDRICK ADAMS,
in Their Individual Capacities for State Law
Violations Only**

DEFENDANTS

UNOPPOSED MOTION FOR EXTENSION OF TIME

COME NOW, DEFENDANTS, Washington County, Mississippi, and Cedrick Adams, Individually, and pray that this Court grant an extension through and including October 24, 2022, to file an answer or file a responsive pleading and objections to the Complaint filed herein by Plaintiff, to-wit:

1. Undersigned counsel for the County was only recently retained and requires additional investigation and assessment of the record prior to filing an answer or responsive pleading and objections as required by the *Mississippi Rules of Civil Procedure*.

2. Plaintiff filed her Complaint in the U.S. District Court, Northern District of, Mississippi, on July 22, 2022 [**Doc. 1**]. Summons was served to Defendant Washington County on August 11, 2022, and Defendant Adams on August 10, 2022.

3. Defendants filed their first Motion for Additional Time on August 24, 2022 [**Doc. 7**].

4. Additionally, due to prior professional commitments and other matters set on the undersigned's docket for the current month of September, 2022, the undersigned has not yet had enough time nor will have enough available time to communicate with clients and review documents

regarding this matter and requires more time to file a responsive pleading.

5. An extension to answer until October 24, 2022, will not cause any undue hardship or prejudice the interest of any party.

6. Counsel for the Plaintiff has been contacted, and the undersigned counsel is authorized to state that counsel for the Plaintiff has no objection to the extension of time.

7. Movant requests that he be relieved from the requirement of submitting a separate memorandum brief, as the instant motion is self-explanatory and the requested relief is consistent with the *Mississippi Rules of Civil Procedure*.

WHEREFORE, Defendants Washington County and Cedrick Adams pray that the Court enlarge the deadline for them to file an answer or responsive pleading to Plaintiff's Complaint to and including October 24, 2022.

RESPECTFULLY SUBMITTED this the 21st day of September, 2022.

JACKS GRIFFITH LUCIANO, P.A.

By: /s/ **Arnold U. Luciano**
Arnold U. Luciano, MS Bar No. 99198
Attorney for Defendants Washington County,
MS and Cedrick Adams, Individually

Of Counsel:

JACKS GRIFFITH LUCIANO, P.A.
150 North Sharpe Avenue
P. O. Box 1209
Cleveland, MS 38732
Phone No. 662-843-6171
FAX No. 662-843-6176
Email: aluciano@jlpalaw.com

CERTIFICATE OF SERVICE

I, Arnold U. Luciano, attorney of record for Defendants, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Motion for Time to File Responsive Pleading and Objections* to be delivered by the ECF Filing System which gave notice to the following:

Jim Waide, Esq.
Waide & Associates, P.A.
Email: waide@waidelaw.com
Attorneys for Plaintiff

William Robert Allen, Esq.
Allen, Allen, Breeland & Allen, PLLC
Email: will.allen@aabalegal.com
Attorney for Jarrell Evans, Individually

Willie Griffin, Esq.
Bailey & Griffin
Email: wgriffinlawyer@aol.com
Attorney for Defendants

DATED this 21st day of September, 2022.

/s/ **Arnold U. Luciano**
Arnold U. Luciano